

Benjamin J. Otto (ISB No. 8292)
710 N 6th Street
Boise, ID 83701
Ph: (208) 345-6933 x 12
Fax: (208) 344-0344
botto@idahoconservation.org

RECEIVED
2014 APR -7 AM 11:18
IDAHO PUBLIC
UTILITIES COMMISSION

Attorney for the Idaho Conservation League

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE)	
APPLICATION OF IDAHO POWER)	CASE NO. IPC-E-14-03
COMPANY FOR AUTHORITY TO)	
IMPLEMENT FIXED COST)	THE IDAHO CONSERVATION
ADJUSTMENT (FCA) RATES FOR)	LEAGUE
ELECTRIC SERVICE FROM JUNE 1,)	PETITION TO INTERVENE
2014 THROUGH MAY 31, 2015.)	

The Idaho Conservation League ("ICL") petitions the Commission to intervene in this matter pursuant to the Idaho Public Utilities Commission Rules of Procedure, IDAPA 31.01.01.071-073. As discussed below, ICL has direct and substantial interests in these proceedings, and therefore should be granted intervention.

1. The name of this intervenor is:

Benjamin J. Otto
Idaho Conservation League
710 N. 6th st.
Boise, Idaho 83702
Ph: (208) 345-6933 x 12
Fax: (208) 344-0344
botto@idahoconservation.org

In the interest of conserving natural resources and reducing the costs, please provide hard copies of pleadings, testimony, and briefs only to the name and address above. Production requests, responses, notices, Commission orders, and other filings may be submitted via electronic mail in accordance with IDAPA 31.01.01.063.02-03.

2. The Idaho Conservation League claims a direct and substantial interest in this proceeding. As Idaho's largest state-based conservation organization, we have over 20,000 supporters, most of who are residential customers of Idaho Power. We have a substantial interest in maintaining a robust energy conservation program to avoid burning fossil fuels and the need for additional energy infrastructure both of which meet our supporters' desire to protect Idaho's air quality and natural landscapes. Over the years ICL has participated extensively in the Fixed Cost Adjustment because the mechanism is a critical regulatory policy to align Idaho Power's financial signals with Idaho's policy of pursuing all cost-effective energy efficiency. The annual rate adjustment covered by this application is an important part of maintaining a well functioning FCA mechanism. Due to this long-term involvement in restructuring the regulatory environment to promote energy efficiency in Idaho, ICL brings a unique and valuable perspective to this proceeding. ICL's intervention will not unduly broaden the issues in this proceeding.

3. ICL intends to fully participate in this matter as a party. The nature and quality of ICL's intervention in the proceeding is dependant upon the nature and effect of other evidence in this proceeding. ICL may seek intervenor funding pursuant to IDAPA 31.01.01.161-165.

WHEREFORE, ICL respectfully requests the Commission grant this petition.

DATED this 2nd day of April 2014.

Respectfully submitted,



Benjamin J. Otto
Idaho Conservation League

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of April, 2014, I delivered true and correct copies of the foregoing PETITION TO INTERVENE to the following persons via the method of service noted:

Hand delivery:

Jean Jewell
Commission Secretary (Original and seven copies provided)
Idaho Public Utilities Commission
427 W. Washington St.
Boise, ID 83702-5983

Electronic Mail:

Lisa D. Nordstrom
Zachary L. Harris
Greg Said
Idaho Power Company
P.O. Box 70
Boise, Idaho 83707
lnordstom@idahopower.com
zharris@idahopower.com
gsaid@idahopower.com
dockets@idahopower.com



Benjamin J. Otto